

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA

Defendant.

Misc. No. 17-151-LPS

**DECLARATION OF MAYLING C. BLANCO IN SUPPORT OF GREEN EARTH  
TECHNOLOGIES, INC.'S MOTION FOR EXTENSION OF THE COURT'S  
DEADLINE OF JANUARY 12, 2024, FOR OBTAINING PETITIONERS'  
CONDITIONAL WRITS OF ATTACHMENT *FIERI FACIAS***

Pursuant to 28 U.S.C. § 1746, Mayling C. Blanco hereby declares as follows:

1. I am an attorney duly admitted to practice law in New York and New Jersey and am a partner in the New York office of Norton Rose Fulbright. I represent the interested third party Green Earth Technologies, Inc. (the "Green Earth").

2. I submit this declaration in support of the Motion for Extension of the Court's Deadline of January 12, 2024, for obtaining Conditional Writs of *Fieri Facias*, and join in the motions filed by Ostrider Limited, UML Blandford Limited, Union Glory Limited, and Clion Limited filed yesterday.

3. On February 15, 2016, Green Earth was forced to file a verified petition In the District Court of Harris County, Texas, 334<sup>th</sup> Judicial District, bearing cause no. 2016-09386 (the "Texas Case") against Defendants Bariven, PDVSA Services, PDVSA Gas (collectively the "PDVSA Entities"), Green Hook, and Alfredo Lovera (collectively the "Texas Defendants") due to breach of a contract for goods delivered to PDVSA and related parties that was not paid.

4. Green Earth began to prosecute its claims against the Texas Defendants in 2016.

5. On or about March 7, 2017, due to the various issues involving the political situation in Venezuela, the Green Earth and the Texas Defendants placed the case in abeyance pending resolution, or at least an easing, of the political situation in Venezuela.


6. Of course, the situation has not eased and the case remained in abeyance.

7. Once Green Earth was made aware of the pending cases before the U.S. District Court for the District of Delaware, *i.e.*, *Crystallex Int'l. Corp. v. Bolivarian Republic of Venezuela*, C.A. No. 17-mc-00151-LPS, and related cases and appeals, it moved diligently to obtain legal advice regarding the Texas Case, to retain local counsel in Delaware, and to prepare and file the documents necessary to secure a judgment in the Texas Case and have it recognized pursuant to the steps set out in this action.

8. Three recent orders entered on December 28, 2023 and January 12, 2024 in the Texas Case now clears the way for Green Earth Technologies to move to secure a final judgment against the PDVSA Entities, which Green Earth Technologies continues to pursue expeditiously.

9. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: January 12, 2024  
New York, NY

  
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Mayling C. Blanco